

# **EXHIBIT G**



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1 concept of your art having an impact on 11:15:14  
2 society. Where does that rank for you in terms 11:15:16  
3 of importance? 11:15:20

4 MR. ZIRPOLI: Object to the form 11:15:22  
5 of the question. 11:15:23

6 A. I take seriously the concepts of 11:15:23  
7 good and evil. And to that end, I want to 11:15:43  
8 entertain people, but hopefully do it in a way 11:15:50  
9 that is communicating the ideas of what good 11:15:54  
10 and evil are. 11:15:59

11 Q. Do you believe that your writings 11:16:00  
12 espouse that view; that you want to write about 11:16:05  
13 concepts of good and evil? 11:16:10

14 A. I would think so. 11:16:12

15 Q. Do you believe that in so doing, 11:16:13  
16 you are impacting society? 11:16:16

17 A. I have no idea. 11:16:18

18 Q. When you wrote Snowblind, Ararat, 11:16:20  
19 Dead Ringers and The Pandora Room, did you 11:16:29  
20 think that any of them would be used to teach 11:16:33  
21 language to an AI Large Language Model? 11:16:36

22 A. Certainly not. 11:16:40

23 Q. Didn't cross your mind? 11:16:40

24 A. No. 11:16:43

25 Q. That certainly wasn't a motivation 11:16:43

1	for you writing the books?	11:16:45
2	A. Certainly not.	11:16:46
3	Q. I didn't ask you this. Are any of	11:16:48
4	the books that you've published adaptations of	11:16:53
5	earlier books?	11:16:59
6	A. No. But I had the basic concept	11:17:00
7	of The Pandora Room was developed at a time	11:17:10
8	when I was going to do it as a Hellboy novel.	11:17:13
9	Hellboy, being a comic book series created and	11:17:17
10	own by my friend and collaborator Mike Mignola.	11:17:22
11	Didn't end up writing it that way.	11:17:26
12	Eventually I was asked to do a	11:17:30
13	short story for an anthology called, I think,	11:17:32
14	The Library of the Dead. And I wrote a short	11:17:37
15	story with my friend Tim Levin called Fault	11:17:41
16	Lines that does include the same concept of the	11:17:45
17	two jars. I think that's what we did.	11:17:50
18	When it came time to do The	11:17:56
19	Pandora Room, I relied on my original pitch for	11:17:57
20	the idea that I was going to originally do as a	11:18:02
21	Hellboy novel. And that's the story of that.	11:18:05
22	Q. Had you assigned your rights to	11:18:12
23	the earlier treatment that involved the two	11:18:14
24	jars to anybody else?	11:18:17
25	A. No.	11:18:18

1 C E R T I F I C A T E  
2

3 I, MaryJo O'Connor, a Notary Public  
4 in and for the Commonwealth of  
5 Massachusetts, do hereby certify:

6 That CHRISTOPHER GOLDEN, the  
7 witness whose testimony is hereinbefore set  
8 forth, was duly sworn by me and that such  
9 testimony is a true and accurate record of  
10 my stenotype notes taken in the foregoing  
11 matter to the best of my knowledge, skill  
12 and ability.

13 IN WITNESS WHEREOF, I have hereunto  
14 set my hand and Notarial Seal this 30th day  
15 of September 2024.

16  
17  
18   
19

20 MARYJO O'CONNOR, RDR/RMR  
21 Notary Public  
22  
23

24 My Commission expires:  
25 September 12, 2025

20 | Reported By:

21 Michele D. Lambie, CSR-RPR

1 that has yet to be established, because when 05:59:53  
2 copyrighted work is taken without permission or 05:59:58  
3 compensation, we don't know yet what the market is. 06:00:01  
4 I mean ... 06:00:06  
5 BY MS. DUNNING: 06:00:09  
6 Q. When you wrote your six books, did you 06:00:09  
7 have any intention of licensing those books to 06:00:15  
8 anyone for AI training? 06:00:20  
9 MR. SWEATMAN: Object to form. 06:00:22  
10 THE WITNESS: The six books in the class 06:00:23  
11 were written before I knew that AI training 06:00:30  
12 existed. 06:00:32  
13 BY MS. DUNNING: 06:00:33  
14 Q. Okay. And so when you wrote those books, 06:00:33  
15 was one of the purposes in writing them so that 06:00:37  
16 they could be used to train a generative artificial 06:00:41  
17 intelligence model? 06:00:45  
18 A. I don't -- 06:00:47  
19 MR. SWEATMAN: Object to form. 06:00:47  
20 THE WITNESS: I don't see how I could 06:00:47  
21 have the intention to do something that wasn't yet 06:00:49

1 possible according to my knowledge. 06:00:51

2 BY MS. DUNNING: 06:00:53

3 Q. Okay. So you did not have that intention 06:00:53

4 at the time you wrote the books? 06:00:55

5 MR. SWEATMAN: Object to form. 06:00:58

6 THE WITNESS: That was not my intention. 06:00:58

7 BY MS. DUNNING: 06:01:01

8 Q. And it was not your purpose in 06:01:01

9 writing -- let me ask it again. 06:01:06

10 It wasn't a purpose in your writing those 06:01:08

11 six books that they be used to train an AI model, 06:01:13

12 right? 06:01:18

13 MR. SWEATMAN: Object to form. 06:01:18

14 THE WITNESS: That was not my intent or 06:01:19

15 my purpose. 06:01:22

16 BY MS. DUNNING: 06:01:22

17 Q. You've already testified that you 06:01:22

18 personally, to the best of your knowledge, have not 06:01:34

19 used any Meta LLM, correct? 06:01:37

20 A. To the best of my knowledge, I have not. 06:01:41

21 MR. SWEATMAN: Object to form. 06:01:44

1 State of Maryland

2 County of Baltimore, to wit:

3 I, Michele D. Lambie, a Notary Public of  
4 the State of Maryland, County of Baltimore, do  
5 hereby certify that the within-named witness  
6 personally appeared before me at the time and place  
7 herein set out, and after having been duly sworn by  
8 me, according to law, was examined by counsel.

9 I further certify that the examination  
10 was recorded stenographically by me and this  
11 transcript is a true record of the proceedings.

12 I further certify that I am not of  
13 counsel to any of the parties, nor related to any  
14 of the parties, nor in any way interested in the  
15 outcome of this action.

16 As witness my hand and notarial seal this  
17 2nd day of October 2024.

18  
19   
20  
21

CONFIDENTIAL

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF CALIFORNIA  
3                   SAN FRANCISCO DIVISION

4    - - - - - - - - - - - - - - - +  
5    RICHARD KADREY, et al,           |  
6                   Plaintiffs,        | Case Number:  
7                   vs.                | 3 :23 - cv - 03417 - VC  
8                   META PLATFORMS, INC., a   |  
9                   Delaware corporation,   |  
10                  Defendant.        |  
11    - - - - - - - - - - - - - - - +

12  
13  
14                  Confidential Videotaped Deposition of  
15    RACHEL LOUISE SNYDER  
16   Wednesday, December 11, 2024  
17   at 9:42 a.m.  
18   in Washington, D.C.  
19  
20  
21                  Reported by:  
22                  Laurie Donovan, RPR, CRR, CLR  
23                  JOB 7030288  
24  
25                  PAGES 1 - 285

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1       it was designed to be helpful, is, is that not a, a  
2       purpose and use case that could support the learning  
3       and development that you try to foster in your  
4       students?

5           A       That scenario that you described is so far  
6       from the realm of any high school student that I know,  
7       like they're not going, oh, AI, okay, thank you, this  
8       is a really good introduction. I'm going to go walk  
9       and do my research now. Like they don't do that.

10                  What they do is they say, hey, you know  
11       what? I want to go to the Taylor Swift concert. I  
12       got to get this paper off my desk as soon as possible,  
13       and they, you know, they have the lowest input, even  
14       the really good students. Like I'm not just talking  
15       about the losers like I was in high school.

16                  I mean students who are getting As and Bs  
17       and mostly As are using AI, and they're using it  
18       across the board. They're not using it as like a step  
19       into deeper research. Like maybe grad students do  
20       that, maybe, but even grad students, I would bet, who  
21       are like under the gun or under pressure are -- you  
22       know, they're just -- it's just tempting to take a  
23       shortcut, and easy.

24                  Q       When you wrote No Visible Bruises, did you  
25       ever think it would be used to teach language to an AI

1 model?

2 A AI hadn't even been invented, so far as I'm  
3 aware. No. I certainly never thought that, no.

4 Q So write -- you did not write No Visible  
5 Bruises so that it could be used to teach an AI model,  
6 right?

7 A No.

8 Q That wasn't any part of the motivation for  
9 you to write your book?

10 A No.

11 Q Would you say you have a loyal fan base?

12 A No.

13 Q Are there people, given your journalism over  
14 the years, that you believe, you know, trust and  
15 respect your writing as a source of, you know,  
16 well-researched, you know, truth?

17 A I hope so. I mean maybe. I don't know.

18 MS. DUNNING: We've been going about an  
19 hour. Should we take just a five-minute break?

20 MR. RATHUR: I'm okay to keep going, but  
21 I'll defer to Rachel.

22 MS. DUNNING: I want to make sure our court  
23 reporter doesn't need a break.

24 THE REPORTER: I need a little break.

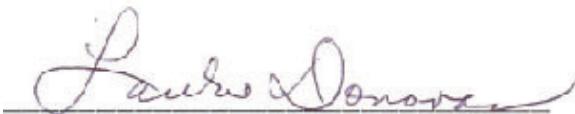
25 MR. RATHUR: We can go off the record.

1 CERTIFICATE OF SHORTHAND REPORTER -- NOTARY PUBLIC  
2

3 I, Laurie Donovan, Registered Professional  
4 Reporter, Certified Realtime Reporter, and notary  
5 public for the District of Columbia, the officer  
6 before whom the foregoing deposition was taken,  
7 do hereby certify that the foregoing transcript  
8 is a true and correct record of the testimony  
9 given; that said testimony was taken by me  
10 stenographically and thereafter reduced to  
11 typewriting under my supervision; and that I am  
12 neither counsel for, related to, nor employed by  
13 any of the parties to this case and have no  
14 interest, financial or otherwise, in its outcome.

15 IN WITNESS WHEREOF, I have hereunto set my  
16 hand and affixed my notarial seal this 24th day  
17 of December 2024.

18  
19 My commission expires: July 14, 2027

20  
21   
22

23 LAURIE DONOVAN  
24 NOTARY PUBLIC IN AND FOR  
25 THE DISTRICT OF COLUMBIA